

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

<p><b>CHRISTOPHER SOGHOIAN,</b></p>	)	
	)	
<b>Plaintiff,</b>	)	Civil Action No. 11-1080 (ABJ)
	)	
<b>v.</b>	)	ECF
	)	
<b>DEPARTMENT OF JUSTICE</b>	)	
	)	
<b>Defendant.</b>	)	
	)	

**PLAINTIFF’S CONSENT MOTION FOR ENLARGEMENT OF TIME TO FILE A  
MOTION IN OPPOSITION TO DEFENDANT’S MOTION FOR SUMMARY  
JUDGMENT AND TO AMEND THE COURT’S JANUARY, 19 2012 MINUTE ORDER**

Plaintiff, Christopher Soghoian, pro se, respectfully moves this Court pursuant to Federal Rule of Civil Procedure 6(b)(1) for an enlargement of time of 31 days to, and including, April 9, 2012, in which to file a motion in opposition to the defendant’s motion for summary judgment in this case, which arises under the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552, as amended. Plaintiff’s motion is due by March 9, 2012, pursuant to the Court’s Minute Order dated January 19, 2012. This is plaintiff’s first request for an enlargement of time of this deadline.

Pursuant to Local Rule 7(m), plaintiff has conferred with defendant’s counsel, Mr. Interrante, and defendant consents to the requested extension. As Mr. Interrante will be on leave the week of April 9, 2012, defendant has requested an additional week to submit its reply. The plaintiff has consented to this request. A proposed order granting this motion is attached.

There is good cause to grant this motion. Plaintiff is a pro se litigant and does not have a formal education in the law. Other than two amicus briefs filed in surveillance related cases during the past two years, plaintiff also has no experience litigating in the Federal Courts. Plaintiff thus requires additional time to become acquainted with the FOIA litigation process and to prepare his response.

WHEREFORE, Plaintiff respectfully requests an enlargement of time of 31 days to file a motion in opposition to the defendant’s motion for summary judgment and that the Court enter the proposed Order amending the January 19, 2012 Minute Order as agreed by the parties.

Respectfully submitted,

/s/

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